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**From:** Dave Hargett [Ex. 6 Personal Privacy (PP)]  
**Sent:** 9/18/2020 1:12:00 PM  
**To:** Cole, Robert [colerb@dhec.sc.gov]  
**CC:** williajc@dhec.sc.gov; Famble, Alayna [famble.alayna@epa.gov]; Porter, Henry [porterhj@dhec.sc.gov]; reecemc@dhec.sc.gov; Rita Barker [rbarker@wyche.com]; William Bridges [Ex. 6 Personal Privacy (PP)]; G. Ken Taylor [taylorgk@dhec.sc.gov]; Angela K. Gorman [gormanak@dhec.sc.gov]; Crowley, Jeffery [Crowley.Jeffery@epa.gov]  
**Subject:** Lake Conestee Re: Organic Data (PA/SI Process)

Thanks for the quick response, Robert.

I completely understand the Department's scope and focus of this project, and your obligations to share information....

We do deeply appreciate the work you and your team are doing on this challenging project. But no less than we appreciate the incredible support we have had from DHEC, and EPA, on the Lake Conestee project for the last 22 years. This is but the latest chapter of insight into a large, complex, serious site, that will regardless of its status, have to have perpetual care (*close to the conversation I had w/ Jeffery Crowley over a year ago*).

If the site warrants being listed to the NPL, then that assessment simply needs to be in the large and complete context, as a watershed-impacted site, posing a risk to downstream resources, and including consideration that there have been previous major unpermitted releases (numerous) from the site downstream over the last 100+ years.

Still, we have a large mass of CoCs that have to be managed for generations to come, or longer. As I'm sure your team agrees, it could be extremely misleading for various interested parties to take one chapter of the immense knowledge we've accumulated on this site and assume that tells the entire story, much less to make management decisions based on one piece of the whole.

Very best regards / Good health !  
Dave

*(This site has aged me a lot more than the 22 years that have elapsed since we started this partnership w/ DHEC !)*

**Dave Hargett, Ph.D.**  
**Founder & Executive Director**  
Conestee Foundation / Lake Conestee Nature Preserve

[Ex. 6 Personal Privacy (PP)]

[dave@conesteepereserve.org](mailto:dave@conesteepereserve.org)

*Owner & Steward of Lake Conestee Nature Preserve*  
*LCNP: Celebrating 14 Years of Discovery !*  
*An Important Bird Area of Global Significance*  
*Upstate Partner with Audubon - South Carolina*  
*Lake Conestee: A National Register of Historic Places Site*  
<http://conesteepreserve.org>  
<https://www.facebook.com/LakeConestee>

On Fri, Sep 18, 2020 at 8:39 AM Cole, Robert <[colerb@dhec.sc.gov](mailto:colerb@dhec.sc.gov)> wrote:

Dave,

Just wanted to send a quick follow-up to your email. We look forward to sharing the rest of the results as they come in. We will not be doing any significant data analysis until we get the full data package. Please keep in mind that our approach and data objectives are related to the possibility of the Lake Conestee site being a National Priorities List site. We have to look at Hazard Ranking System considerations as well as the larger picture that you are concerned with.

We are scheduled to collect additional sediment data from upgradient locations the last week of September. I would expect to see this data in early November. That puts the final report into December or January.

Also, we have no control over access to or dissemination of this data. As a public agency, if anyone request the data, it will be given. We appreciate all of your support and assistance in this investigation. However, the "collaboration" will not extend to influencing the final report or it's recommendations.

Thanks again and we will be in touch soon.

Robert

Robert Cole, Manager  
Federal & State Site Assessment Section  
SCDHEC Bureau of Land & Waste Management  
(803) 898-0802  
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**From:** Dave Hargett <[Ex. 6 Personal Privacy \(PP\)](#)>

**Sent:** Thursday, September 17, 2020 5:55 PM

**To:** Williams, Jason C. <[williajc@dhec.sc.gov](mailto:williajc@dhec.sc.gov)>

**Cc:** Cole, Robert <[colerb@dhec.sc.gov](mailto:colerb@dhec.sc.gov)>; Famble, Alayna <[famble.alayna@epa.gov](mailto:famble.alayna@epa.gov)>; Porter, Henry <[porterhj@dhec.sc.gov](mailto:porterhj@dhec.sc.gov)>; Reece, Myra <[reecemc@dhec.sc.gov](mailto:reecemc@dhec.sc.gov)>; Rita Barker <[rbarker@wyche.com](mailto:rbarker@wyche.com)>; William Bridges

<[Ex. 6 Personal Privacy \(PP\)](#)>

**Subject:** Re: Organic Data

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Thank you very much for forwarding the data report on organics from your LakeConestee SI work, Jason.

I'll preface these comments by acknowledging that "I may be wrong."

Still, I've already made a very quick (and superficial) first pass review and see some issues that we'll need to discuss.

For this organics report I'm focused particularly on PAHs, and the key issues I see are detection levels, and the range of results.

Just looking at the PAHs in our TBA reports (2001-2004) we had detects for all of the ~17 PAHs, ranging from double digits for each to thousands for over half of the compounds. For most compounds we had over half of samples we had detects each compound in well over half of samples. Average values across the entire population of samples in the thousands for all 7 of the CPAHs except Dibenzo (A,H)..... And as a result the average for Total PAHs across all of our samples was in the thousands.

In the present report, based on just a quick glance, I'm seeing about 17 total detections for 61 samples that don't have J-flags, that is out of 61 samples x 17 PAH compounds. I don't see any detects for PAHs, including those w/ J-flags above 3 digits,,,,,

By comparison in our TBA reports we had well over a hundred specific PAH/sample detections that were 4 digits, including some specific samples with specific PAH concentrations of nearly 10,000 ug/kg.

This suggests there may be some real data comparability concerns in assessing these two bodies of data, side by side. Or maybe not. We just need to be vigilant in making sure the analytical protocols were similar, and there are no limits to comparison between the datasets.

And for many of the lakebed locations, whether under water or on accreted bottomland soil, the lake is very dynamic. The majority of the locations you sampled have likely accreted additional soils or sediments over the last 17 years, some several feet. There may be a few that have been scoured, but not many.

Example: Today, with our remnants of Hurricane Sally and about 3" of rain locally, the entire lakebed, and all of your sampling points were under 2 to 5+ additional feet of stormwater, and all that washes into the lake with those floodwaters. Another data comparability issue to be cognizant of.

On the other hand, if your dataset indicates generally lower levels of organic contaminants, that does not invalidate the results from our TBA work, but rather underscores that "what lies beneath" is still a concern in terms of containment. In fact, it may verify that our "remedy" of containment and monitored natural recovery, by allowing progressively cleaner sediments to cascade in and cap the older lake sediments was a good direction to take back in 2007 when our VCC was certified and our RC was recorded. That was also indicated at that time by the deeper samples we took in the reservoir body, indicating much higher levels of CoCs (generally) in the deeper strata of the lake. And, of course, that comports with the effectiveness of regulatory programs over the decades.

Until we collaborate to get a handle on these issues, and either prove me wrong, or assess how to interpret the data sets, we need to be careful into whose hands this data flows..... It seems that this important assessment will contribute substantially to the 'total story' of what lies in the repository that we know as old Lake Conestee.

And, what our Restrictive Covenant governs is all of the contents of the Lake Conestee reservoir, not just the veneer of recent deposits.

I'll get deeper into it later.

I'm here to help.

Dave

**Dave Hargett, Ph.D.**  
**Founder & Executive Director**  
Conestee Foundation / Lake Conestee Nature Preserve

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[dave@conesteepereserve.org](mailto:dave@conesteepereserve.org)

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<https://www.facebook.com/LakeConestee>

On Thu, Sep 17, 2020 at 10:01 AM Williams, Jason C. <[williajc@dhec.sc.gov](mailto:williajc@dhec.sc.gov)> wrote:

Dave ,

Here is the remainder of the data package for the preserve detailing the organics analysis.

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State & Federal Site Assessment Section  
S.C. Dept. of Health & Environmental Control  
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